

September 1, 2009

Via Facsimile and UPS Overnight Delivery

The Honorable Cynthia M. Rufe
United States District Court
Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Suite 12614
Philadelphia, PA 19106-1797

**RE: Avandia MDL 1871—Appointment of Samuel W. Lanham, Jr. to
Membership on the Plaintiffs' Steering Committee**

Dear Judge Rufe:

I respectfully request your consideration of my appointment to the Plaintiffs' Steering Committee, pursuant to Pretrial Order No. 69 [Doc. No. 494]. My earlier application for appointment to the PSC, providing highlights of my litigation experience in pharmaceutical cases, mass torts and other matters, was submitted in March, 2008 [Doc. No. 60].

As a relative newcomer to national pharmaceutical litigation, I understood and accepted your Order of April 9, 2008 [Doc. No. 103], making the initial appointments to the PSC. I also resolved at that time to stay actively involved in this litigation and to give my very best for the common benefit of plaintiffs. I have accomplished this goal.

I have worked very closely on a regular basis with the PSC and its leadership. I have devoted considerable time and resources to this litigation, and I will continue to do so.

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My contributions to this litigation have included the following:

- I am a member of the leadership team in this litigation, and as such have attended numerous leadership meetings and strategy sessions.
- PSC leadership has assigned me to be one of a small group of deposition “team leaders.” In that role, I have taken and assisted in taking the depositions of GlaxoSmithKline’s employees. I will continue in this capacity throughout the litigation.
- I have personally supervised and assisted in the review of thousands of documents in preparation for various depositions. My supervision of this effort has involved working closely with lawyers throughout the country who participate in custodial document review for depositions that I have been assigned.
- I have designated two others in my firm—a lawyer and a paralegal—to assist in document review and deposition outline preparation. To date, the three of us have devoted more than 2,000 hours to this litigation. Personally, I have re-arranged my schedule and found coverage for other matters, in order to make a major time commitment to this litigation.
- I have volunteered and am responsible for preparing a database of all deposition exhibits to aid in trial preparation and trial.
- I have participated actively in the ongoing organization, refinement, and search strategies for the GSK document production database.
- I have appeared and argued before Special Discovery Master Shestack regarding discovery matters. Recently, I have been assigned the task of assessing missing and incomplete document production by GSK, for the further attention of Special Master Shestack where the parties are unable to reach agreement.
- My firm is working with one other firm to prepare certain demonstrative aids for plaintiffs’ trial preparation and likely use at trial.

I am a team player, believing that in whatever I do, my highest and best contribution is to devote my particular skill set for the benefit of the “common good”—in this instance, for the common benefit of the plaintiffs in this litigation. My personal code and work ethic is to deliver on what I say I will do and to work hard, while also enjoying the company

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along the way. I am honored to work in this litigation with some of this country's best litigators—both professionally and personally.

You have my word that I will continue to dedicate my time, energy and resources to the benefit of the plaintiffs in this litigation. I believe PSC leadership would attest to that commitment.

Thank you for your consideration of my application. I look forward to appearing before you on September 9, 2009, and addressing any questions you may have.

Very truly yours,

/s/ SWL8143

Samuel W. Lanham, Jr.
slanham@lanhamblackwell.com

SWL/sjc